

EXHIBIT 2

From: Christine Kingston
Sent: Friday, February 5, 2021 11:21 AM
To: ted@broderick-law.com; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgrouppc.com>
Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Do you have time to chat briefly about this in the afternoon?



CHRISTINE M. KINGSTON **PARTNER**
christine.kingston@nelsonmullins.com
ONE FINANCIAL CENTER | SUITE 3500
BOSTON, MA 02111
T 617.217.4794 F 617.217.4710
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From: ted@broderick-law.com <ted@broderick-law.com>
Sent: Thursday, February 4, 2021 5:09 PM
To: Christine Kingston <christine.kingston@nelsonmullins.com>; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex

Washkowitz' <alex@cwlawgrouppc.com>

Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Christine

The portion of the thread that I produced is all that relates to this case, which is what you asked for. The balance of the thread was redacted as it was not requested, but I did not want to be accused of altering a document. A conversation about things other than this case was not requested, nor would it be relevant.

Ted

From: Christine Kingston <christine.kingston@nelsonmullins.com>

Sent: Thursday, February 4, 2021 12:00 PM

To: ted@broderick-law.com; Kevin Polansky <kevin.polansky@nelsonmullins.com>

Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgrouppc.com>

Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Ted,

Please produce the full, unredacted message chain today.

Redactions are reserved for claimed privilege only, and you haven't invoked privilege, served a privilege log, and no privilege between Novia and Mantha would exist. Moreover, at least one of the messages that is redacted is from the same day as the other texts and Mantha references it in the unredacted texts. It is clearly relevant. No. 42 broadly relates not only to the subject matter of this lawsuit, but the TCPA generally.

These messages should have been served in response (original or supplemented) to the First Set of RPDs served on April 28, 2020, which requested any communications between Mantha and a third-party concerning the subject matter of this suit. We also expressly requested the communications between Mantha and Novia in our Fourth Set of RPDs served on August 14, 2020. Now we're getting these redacted, partial documents in February 2021 for the first time. We have requested, and are owed, all communications, unredacted.

In addition, these are not the full texts between Novia and Mantha. Novia testified that he confirmed by text with Mantha that the texts he received would be covered by the TCPA. Mantha testified that he and Novia texted about the texts themselves, as Novia was coaching him. This likely would have been in mid-August 2019 or after. These messages are clearly responsive and have not been produced. Please produce all communications between Novia and Mantha that relate to this lawsuit, the texts to Mantha from QuoteWizard, or the TCPA.

Thanks,
Christine



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christine.kingston@nelsonmullins.com

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From: ted@broderick-law.com <ted@broderick-law.com>
Sent: Thursday, February 4, 2021 9:53 AM
To: Christine Kingston <christine.kingston@nelsonmullins.com>; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgroupcc.com>
Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Both.

From: Christine Kingston <christine.kingston@nelsonmullins.com>
Sent: Thursday, February 4, 2021 9:42 AM
To: ted@broderick-law.com; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgroupcc.com>
Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Are you referring to the redactions, or the cut-off at page 4, or both?



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christine.kingston@nelsonmullins.com
ONE FINANCIAL CENTER | SUITE 3500
BOSTON, MA 02111
T 617.217.4794 F 617.217.4710
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

From: ted@broderick-law.com <ted@broderick-law.com>
Sent: Thursday, February 4, 2021 9:41 AM
To: Christine Kingston <christine.kingston@nelsonmullins.com>; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgroupcc.com>
Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

That was intentional as the texts have nothing to do with the case.

From: Christine Kingston <christine.kingston@nelsonmullins.com>
Sent: Thursday, February 4, 2021 9:22 AM
To: ted@broderick-law.com; Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgroupcc.com>
Subject: RE: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Ted,

We just received this morning because it was marked as spam, just FYI.

We haven't had the chance to review in length, but I did notice that there are issues with docs Bates Stamped557-577. There appears to be multiple redacted texts (for example on pages 1 and 4). In addition, after page 4, the texts are cut off and not readable. Please re-send so that the entire thing is readable and unredacted.

Thanks,
Christine



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christine.kingston@nelsonmullins.com
ONE FINANCIAL CENTER | SUITE 3500
BOSTON, MA 02111
T 617.217.4794 F 617.217.4710
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

From: ted@broderick-law.com <ted@broderick-law.com>
Sent: Wednesday, February 3, 2021 5:00 PM
To: Kevin Polansky <kevin.polansky@nelsonmullins.com>; Christine Kingston <christine.kingston@nelsonmullins.com>
Cc: 'Matthew McCue' <mmccue@massattorneys.net>; 'Anthony Paronich' <anthony@paronichlaw.com>; 'Alex Washkowitz' <alex@cwlawgrouppc.com>
Subject: [Warning! - Spam Score 100] - Mantha v. QuoteWizard

Please see attached response to Order Number 132.

Edward A. Broderick
BRODERICK LAW, P.C.
176 Federal Street, Fifth Floor
Boston, MA 02110
Tel: (617) 738-7080
Fax: (617) 830-0327
ted@broderick-law.com

Nelson Mullins is continuing to monitor developments related to COVID-19, including guidance from the Centers for Disease Control and various health officials; and federal, state, and local government authorities. The firm has implemented precautionary measures and plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25 geographically disperse offices. [Click here to visit the Nelson Mullins Coronavirus Resources page](#). Information described therein is subject to change.

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